

Rebuttal Testimony
of
Mark Maple
Engineering Department
Energy Division
Illinois Commerce Commission

St. Louis Pipeline Corporation

Docket No. 02-0664

Petition for a Certificate Authorizing Operation as a Common Carrier
By Pipeline and Authority to Exercise Eminent Domain

January 30, 2004

1 Q. Please state your name and business address.

2 A. My name is Mark Maple and my business address is 527 East Capitol Avenue,
3 Springfield, Illinois 62701.

4 Q. Are you the same Mark Maple who previously filed direct testimony in this
5 docket?

6 A. Yes.

7 Q. What is the purpose of this rebuttal testimony?

8 A. The purpose of my rebuttal testimony is to reiterate my support for St. Louis
9 Pipeline Corporation's ("Petitioner") request, while suggesting one modification.

10 Q. What is the modification that you are proposing?

11 A. I believe that the Petitioner should be required to obtain an easement that is, at a
12 minimum, five feet wide.

13 Q. What is the width of the easement that the Petitioner is asking for in its petition?

14 A. Nowhere in the petition or the direct testimony of Mr. Hopgood does it state the
15 Petitioner's desired easement width. However, Exhibit A to the petition is a legal
16 description of the property, which notes that the width is one foot wide. Data
17 request responses from the Petitioner also confirm the one foot width.

18 Q. What is the minimum easement width that Metro East Sanitary District ("MESD")
19 requires?

20 A. MESD is requiring the Petitioner to obtain a minimum easement width of five feet.
21 According to the testimony of MESD witness Greathouse, MESD has required a
22 five-foot wide easement of every pipeline since the late 1970's or early 1980's
23 (MESD Exhibit 1, p. 11).

24 Q. Why are you proposing that the Petitioner be required to obtain a minimum of a
25 five-foot wide easement?

26 A. The Petitioner is proposing a one-foot wide easement for an eight-inch pipeline.
27 If that pipeline requires any repair, replacement, or other maintenance, the
28 Petitioner would have almost no physical room inside the easement in which to
29 work. It is difficult to imagine that a person could dig, even with hand tools, and
30 keep his or her body, the equipment and the excess dirt all confined to a one-foot
31 wide space. This pipeline may be in good working order right now. However, all
32 pipelines have a limited lifespan and will eventually need repairs and/or
33 replacement. I believe that eventually the Petitioner will need the extra width in
34 order to adequately perform this work.

35 Additionally, as Mr. Greathouse points out on page 12 of his direct testimony, a
36 wider easement ensures that the integrity of this pipeline and other pipelines is

not compromised by installing other pipelines directly adjacent to the Petitioner's pipeline. If MESD allowed eight-inch pipelines to be installed within one-foot wide easements, there is the potential that two pipelines could exist within four inches of one another, since each would have only two inches of easement on either side. This could pose a difficult and potentially unsafe condition if future repairs were necessary.

Q. Are there any Federal or State regulations that require a minimum easement width for a pipeline?

A. To the best of my knowledge, there are no Federal or State regulations that require a minimum easement width for a pipeline. However, in my experience, I have not encountered a pipeline of this type and size having an easement width of less than five feet. I believe that in this instance, good practice and safety mandate an easement that is, at a minimum, five feet wide.

Q. Do you still support the Petitioner's requests as outlined in your direct testimony?

A. Yes, my position is unchanged with the exception of my recommendation on the minimum width requirements.

Q. Does this conclude your rebuttal testimony?

A. Yes.